

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> , ¹ Debtors.	Chapter 7 Case No. 19-12153 (KBO) (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> , Plaintiff, vs. M.A.R.S., INC. dba MODERN AMERICAN RECYCLING SERVICES, Defendant.	Adv. Proc. No. 21-50215 (KBO)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned chapter 11 as counsel to Defendant M.A.R.S., Inc. d/b/a Modern American Recycling Services and, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), request that all notices given or required to be given and all papers served in these cases be delivered to and served upon the parties identified below at the following addresses:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above-referenced Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, hand-delivery, telephone, facsimile transmission or otherwise, in this case.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers (the “Notice”) nor any later appearance, pleading, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding related to, or triable in, this case or any cases, controversy or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses,

setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: April 29, 2021
Wilmington, Delaware

ROBINSON & COLE

By: /s/ Davis Lee Wright

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Modern American Recycling Services*

CERTIFICATE OF SERVICE

I, Davis Lee Wright, hereby certify that a true and correct copy of the *NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS* was filed electronically on April 29, 2021, with the United States Bankruptcy Court and has been served Electronically on the following:

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